



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Donna M. Anderson, Treasurer
National Republican Congressional Committee
- Expenditures
320 First Street
Washington, DC 20003

DEC 09 2002

Identification Number: C00075820

Reference: Amended May Monthly Report (4/1/02-4/30/02), received 7/12/02

Dear Ms. Anderson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page (pertinent portions attached). Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "the federal share of goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate in-kind donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt and use of in-kind contributions as follows:

1. The transfer of the in-kind corporate contribution from the non-federal account to the federal account should be disclosed on Schedule H3. The itemization on Schedule H3 should include the date the Committee received the in-kind contribution, the amount of the contribution and the fundraising event involved.
2. The use or expenditure of in-kind corporate contributions should be

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disclosed on Schedule H4 as non-federal share disbursements. The itemization should provide the same donor identification information required on a Schedule A for in-kind contributions for Federal elections.

3. A second entry on Schedule H4 should then disclose the advance or contemporaneous payment of the federal account's share of the in-kind corporate contribution to the non-federal account.


Please amend your report to properly disclose the in-kind corporate contributions received by your committee (example enclosed).

-Please clarify all expenditures made for "production" on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Line 18 of the Detailed Summary Page of your report discloses a total of \$1,972,779.61 in transfers-in from the non-federal account(s) for joint activity. The sum of the entries itemized on Schedule H3, however, indicates the total to be \$2,002,522.82. Please amend your report to clarify the discrepancy.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Andrea S. Needles
Senior Reports Analyst
Reports Analysis Division

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

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FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (in full)

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

A. Full Name (Last, First, Middle Initial)

CONTINENTAL AIRLINES

Mailing Address

1850 I STREET NW SUITE 1250

City State Zip Code

WASHINGTON DC 20005

COM

Purpose/Event:

MN TRAVEL INKIND

Category/
Type

Description:

Type of Allocated Activity:

☐ Admin./Voter Drive☐ Exempt☒ Fundraising☐ Direct Candidate Support

Event Year-To-Date

3758.97

Date M M / D D / Y Y Y Y
04 / 11 / 2002

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

.00

1618.46

1618.46

Transaction ID: H4043002A3-3087

A. Full Name (Last, First, Middle Initial)

PHILIP MORRIS

Mailing Address

1341 G STREET NW SUITE 500

City State Zip Code

WASHINGTON DC 20005

COM

Purpose/Event:

CF CATERING INKIND

Category/
Type

Description:

Type of Allocated Activity:

☐ Admin./Voter Drive☐ Exempt☒ Fundraising☐ Direct Candidate Support

Event Year-To-Date

28687.23

Date M M / D D / Y Y Y Y
04 / 02 / 2002

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

.00

4197.10

4197.10

Transaction ID: H4043002A3-3088

A. Full Name (Last, First, Middle Initial)

NASDAQ

Mailing Address

1735 K STREET NW WASHINGTON DC 20006

City State Zip Code

WASHINGTON DC 20006

COM

Purpose/Event:

TRAVEL INKIND

Category/
Type

Description:

Type of Allocated Activity:

☐ Admin./Voter Drive☐ Exempt☒ Fundraising☐ Direct Candidate Support

Event Year-To-Date

844586.68

Date M M / D D / Y Y Y Y
04 / 17 / 2002

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

.00

155.13

155.13

Transaction ID: H4043002A3-3089

SUBTOTAL of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

0.00

5970.69

5970.69

TOTAL This Period (last page for each line only) (Federal share to 21(a)(i) and non-Federal share to 21(a)(ii))

FEDERAL SHARE

3799199.39

TOTAL AMOUNT

5867675.97

NON-FEDERAL SHARE

2088476.59

TOTAL This Period for the Non-Federal Share
(used for line 31 of the detailed summary page)

11-11-11 11:11:11